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IRICO GROUP CORP. and
IRICO DISPLAY DEVICES CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 4:07-cv-05944-JST
(N.D. Cal.)

MDL No. 1917

This Document Relates to:
ALL INDIRECT PURCHASER ACTIONS

**IRICO DEFENDANTS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER LG PHILIPS
DISPLAYS MATERIAL SHOULD BE
SEALED PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5(f)**

Date: April 13, 2023
Time: 2:00 pm
Judge: Hon. Jon S. Tigar
Courtroom: 6, 2nd Floor

Pursuant to Civil Local Rules 7-11 and 79-5(f), Defendants Irico Group Corporation and Irico Display Devices Co., Ltd. (collectively, “Irico”) hereby move the Court to consider whether material designated as confidential by LG Philips Displays (“LPD”) should be sealed.

Irico has reviewed and complied with this Court’s Standing Order Governing Administrative Motions to File Materials Under Seal Before District Judge Jon S. Tigar (Mar. 14, 2022) and Civil Local Rule 79-5, including the requirement to file separate motions if a party seeks to file under seal a document containing “portions that more than one party bears the burden of showing is sealable.” Civil L.R. 79-5(f)(5). This motion relates solely to materials designated confidential by LPD.

Irico proposes to seal the following documents or portions thereof:

Document Proposed to Be Sealed or Redacted	Designating Entity
Gray highlighted portions of Exhibit 1 to the Declaration of Thomas Carter in Support of Irico Defendants’ Administrative Motion to Consider Whether LPD Material Should Be Sealed – Apr. 15, 2014 Expert Report of Janet Netz	LPD
Gray highlighted portions of Exhibit 4 to the Declaration of Thomas Carter in Support of Irico Defendants’ Administrative Motion to Consider Whether LPD Material Should Be Sealed – Aug. 5, 2014 Expert Report of Margaret E. Guerin-Calvert	LPD
Exhibit 20 to the Declaration of Thomas Carter in Support of Irico Defendants’ Administrative Motion to Consider Whether LPD Material Should Be Sealed – A document produced by LPD, Bates labeled LPD-NL00018253	LPD
Exhibit 21 to the Declaration of Thomas Carter in Support of Irico Defendants’ Administrative Motion to Consider Whether LPD Material Should Be Sealed – A document produced by LPD, Bates labeled LPD-NL00018267	LPD

1 2 3 4	Exhibit 22 to the Declaration of Thomas Carter in Support of Irico Defendants' Administrative Motion to Consider Whether LPD Material Should Be Sealed – A document produced by LPD, Bates labeled LPD-NL00140679	LPD
5 6 7 8	Exhibit 23 to the Declaration of Thomas Carter in Support of Irico Defendants' Administrative Motion to Consider Whether LPD Material Should Be Sealed – A document produced by LPD, Bates labeled LPD-NL00173522	LPD
9 10 11 12 13	Exhibit 24 to the Declaration of Thomas Carter in Support of Irico Defendants' Administrative Motion to Consider Whether LPD Material Should Be Sealed – A document produced by LPD, Bates labeled LPD-NL00214381	LPD

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15 Civil Local Rule 79-5 governs the filing under seal of documents in civil cases. In
16 compliance with Civil Local Rule 79-5(f), Irico submits this Motion in order to file (a) material
17 designated by LPD pursuant to the Stipulated Protective Order, ECF No. 0306, as “Confidential”
18 or “Highly Confidential;” or (b) references to or quotations from material or data designated by
19 LPD pursuant to the Stipulated Protective Order as “Confidential” or “Highly Confidential.”

20 Irico seeks to file the above material under seal in good faith in order to comply with the
21 Protective Order in this action and the applicable Local Rules. Under Civil L.R. 79-5(c) and (f),
22 the parties that contend the material they have designated is confidential in nature bear the burden
23 to establish that the designated information meets the requirements for sealing. *See Kamakana v.*
24 *City of Honolulu*, 447 F.3d 1172, 1178-80 (9th Cir. 2006). Irico understands that, given the
25 Court’s direction at the hearing on Direct Purchaser Plaintiffs’ November 19, 2021 sealing
26 motion (ECF No. 5966), the designated materials subject to this motion may not qualify for filing
27 under seal. Irico has undertaken to reach out to all parties that have designated information or
28 materials attached to the Declaration of Evan Werbel in Support of Irico’s Motion to Partially

1 Exclude the Proposed Expert Testimony of Dr. Janet Netz (“Werbel Declaration”) as
 2 “Confidential” or “Highly Confidential,” in order to secure their permission to file the materials
 3 publicly.¹ However, LPD currently has no active counsel for the instant litigation and does not
 4 appear to be a currently operating entity.

5 WHEREFORE, Irico respectfully submits this administrative motion pursuant to the
 6 Stipulated Protective Order and Civil Local Rule 79-5(f).

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 8 Dated: February 15, 2023

Respectfully submitted,

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 10 */s/ Thomas Carter*

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18 *Attorneys for Defendants*
 19 *IRICO GROUP CORP. and*
 20 *IRICO DISPLAY DEVICES CO., LTD.*

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 23
 24 ¹ Irico sought and received consent to file publicly all previously designated information
 25 contained, summarized, or compiled in the various expert reports attached to the Werbel
 26 Declaration from the following parties: defendant groups Hitachi, Mitsubishi, Panasonic, Philips,
 27 Samsung Electronics, Samsung SDI, Technology Displays America, Thomson, and Toshiba;
 28 Direct Action Plaintiffs Best Buy and Costco; and third parties Amazon, Ingram Micro, PC
 Connection Inc. (D/B/A Connection) and Zones, Inc. Irico sought and received consent to file
 publicly all previously designated documentary materials attached to Werbel Declaration from
 Hitachi, Panasonic, Philips, Toshiba, and Samsung SDI.